

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

D-1 Antonio Jones
a/k/a: Antonio Draco Jones, Jr.,
D-2 Deshawn Bates,
D-3 Chance Reed

Case: 2:21-mj-30193
Judge: Unassigned,
Case No. Filed: 04-27-2021 At 09:23 AM
USA v. SEALED MATTER (CMP)(MLW)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 18, 2019 in the county of Wayne and elsewhere in the
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 1951(a)	Hobbs Act Robbery

This criminal complaint is based on these facts:

See attached affidavit.

Continued on the attached sheet.



Complainant's signature

Matthew C. Schuff, Special Agent, FBI
Printed name and title



Judge's signature

Hon. Anthony P. Patti, United States Magistrate Judge
Printed name and title

Date: April 27, 2021

City and state: Detroit, MI

Sworn to before me and signed in my presence
and/or by reliable electronic means.

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR AN ARREST WARRANT**

I, Matthew C. Schuff, being duly sworn, state as follows:

INTRODUCTION

1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) and have been so employed for over twelve years. I am currently assigned to the Detroit Division of the FBI, Oakland County Resident Agency. In this capacity, I am charged with conducting federal criminal investigations, to include investigations of Hobbs Act robberies.

2. I make this affidavit in support of an application for an arrest warrant for ANTONIO JONES, DESHAWN BATES, and CHANCE REED. It is for the limited purpose of establishing probable cause and may not include all the information collected during this investigation.

3. The facts in this affidavit come from my personal observations, training, experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrants and does not set forth all of my knowledge about this matter.

4. Based upon the following information, there is probable cause to believe that the above-named individuals committed the crime of Conspiracy to Interfere with Commerce by Robbery, in violation of 18 U.S.C. § 1951(a).

EXPLANATION OF THE VIOLATIONS

5. Pursuant to Title 18 U.S.C. section 1951(a) (commonly known as "The Hobbs Act" or "Hobbs Act Robbery") it is a violation of federal law to interfere with commerce by robbery or extortion. The Hobbs Act also punishes conspiracy and attempts to affect interstate or foreign commerce by robbery or extortion. Proof of the robbery requires a showing that the defendant unlawfully took or obtained tangible personal property from the victim's person or in his presence without the victim's consent and that the defendant used actual or threatened force, violence, or fear of physical injury to the person or property of the victim or others accompanying the victim. 18 U.S.C. § 1951(b)(1). Furthermore, it is considered an interference with commerce if the robbery or extortion "in any way or degree obstructs, delays, or affects commerce or the movement of any article or commodity in commerce."

6. Signet Jewelers Limited, is the parent company of retail jewelry stores such as Jared's Galleria of Jewelry ("Jared's"), Zale's and Kay Jewelers and conducts business across the United States. Signet owned stores, such as Jared's, sell gems mined from outside the United States with interstate distribution that

originates in Akron, Ohio. The merchandise leaves the Akron, Ohio distribution center and is distributed to various stores across the country.

PROBABLE CAUSE

“Smash and Grab” Robberies

7. Since August of 2018, the FBI has been investigating a string of similar “smash and grab” style robberies at jewelry stores. During these robberies, the robbers use hand-held sledge hammers and hammers to break glass display cases and enclosures and then take diamonds and other jewelry. Over 30 such instances—all fitting similar description and *modus operandi*—have occurred since August of 2018 in the Eastern and Western Districts of Michigan, as well as in Illinois, Indiana, Ohio, Pennsylvania, and as far away as Alabama, Florida, Louisiana, New Hampshire, South Carolina, and Tennessee. Investigation to date has shown that many of the robberies are connected and involve numerous subjects who live in the Detroit area and are planning and coordinating the robberies from the Detroit area.

COLLIERVILLE TENNESSEE ATTEMPTED “SMASH AND GRAB” ROBBERY

8. On June 18, 2019 a smash and grab robbery attempt in Collierville, Tennessee was stopped when a local detective noticed suspicious activity at a local Jared’s Jewelry store. During this attempt ANTONIO JONES, DESHAWN BATES, and CHANCE REED were arrested following a robbery in progress. The

MO from this attempt was similar to the string of robberies that was being investigated by the FBI Detroit Division. Three individuals were arrested, and all were from the Detroit area.

9. At the time of the robbery, Detective Roberts from the Collierville Police Department (CPD) was in the area of Jared's and observed a vehicle (the SUBJECT VEHICLE) backing in and out of parking spots at an adjacent store parking lot. Detective Roberts found these movements suspicious and continued to observe the vehicle. As a mall security vehicle drove by, Detective Roberts observed the vehicle as it moved to another spot. Detective Roberts then observed the vehicle pull into the parking lot of Jared's.

10. The SUBJECT VEHICLE backed into a parking space in front of the front door of the Jared's. Detective Roberts observed a suspect exit the vehicle and sprint into the Jared's. Detective Roberts then positioned his police vehicle in the Jared's parking lot and observed a male driver in the SUBJECT VEHICLE. A gray shirt was covering the license plate of the SUBJECT VEHICLE.

11. When backup officers arrived, the driver of the vehicle, later identified as CHANCE REED, of Detroit, was placed into custody. As officers entered Jared's, they observed employees on the ground and were advised that two suspects ran out of the south door of the store. The two fleeing suspects were apprehended on scene by additional CPD units that arrived on scene. The suspects

were later identified as DESHAWN BATES and ANTONIO JONES, also of Detroit.

12. According to the CPD report, witnesses in the store stated the two males (BATES and JONES) entered Jared's and demanded everyone get to the back of the store and onto the floor. The suspects then stole two iPhones from two employees and demanded that the employees open the display cases containing loose diamonds and rings. The suspects yelled "two minutes" and "hurry" as they removed diamonds from the display cases and placed them into bags.

13. When police were observed outside, the suspects forced a store employee to open a side emergency door in an attempt to escape. BATES and JONES ran out of the store. After BATES and JONES were arrested by responding officers, two bags were located. One bag containing diamonds from the display cases was located behind the counter. This bag contained diamonds worth approximately \$181,500. A second bag was located behind an adjacent building, in close proximity to where BATES and JONES fled, along with a set of gloves that matched gloves observed on the suspects during the robbery. This bag was secured and contained stolen diamonds worth approximately \$131,600.

14. Following the arrests, Collierville Police determined all three suspects were from Detroit, Michigan. Each suspect was read his Miranda rights and provided a statement to police. BATES, JONES, and REED each told police that

they drove to Tennessee from Detroit, and attempted to rob the store with the intent of making money off the diamonds. REED further advised he believed he would make the money selling diamonds when they returned to Detroit.

15. JONES, BATES, and CHANCE REED have been detained pending trial on state charges in Tennessee since their arrests.

CONCLUSION

16. Based on the above, there is probable cause to believe ANTONIO JONES, DESHAWN BATES and CHANCE REED committed the offense of Conspiracy to Interfere with Commerce by Robbery, in violation of 18 U.S.C. Section 1951(a).

Respectfully submitted,



Matthew C. Schuff
Special Agent, FBI Detroit

Sworn to before me and signed in my presence and/or by reliable electronic means.


HON. ANTHONY P. PATTI
UNITED STATES MAGISTRATE JUDGE

Date: April 27, 2021